

1 Kim Babka - Regional Director

2 Kristi Mogel - Regional Human Resources Manager

3 Tin Hua, former Area Manager

4 South Coast Plaza

5 David Seitz - Director of Loss Prevention

6 Kim Babka - Regional Director

7 Kristi Mogel - Regional Human Resources Manager

8 Shaheen Mufti - General Manager

9 Le Hua - Men's Department Manager

10 Lethrice Cabungcal - Women's Department Manager

11 Gary Morrill, former General Manager

12 La Jolla

13 David Seitz - Director of Loss Prevention

14 Kim Babka - Regional Director

15 Kristi Mogel - Regional Human Resources Manager

16 Brooke Stengel, General Manager

17 Betsy Cleary - Men's Department Manager

18 Ann Powell - Women's Department Manager

19 Malibu

20 David Seitz - Director of Loss Prevention

21 Kim Babka - Regional Director

22 Kristi Mogel - Regional Human Resources Manager

23 Jenna Baker, General Manager

24 Jennifer McDonell - Assistant Manager

25 Palo Alto

26 David Seitz - Director of Loss Prevention

27 Kim Babka - Regional Director

28 Kristi Mogel - Regional Human Resources Manager

1 Tim Gotzinger, General Manager

2 Sergio Espinoza - Men's Department Manager

3 Jenn Hsu - Women's Department Manager

4 Jesus Valdovinos - Operations Manager

5 Tin Hua - former Area Manager

6 San Francisco

7 David Seitz - Director of Loss Prevention

8 Kim Babka - Regional Director

9 Kristi Mogel - Regional Human Resources Manager

10 Cathy Post, General Manager

11 Chris Schivo - Shipping and Receiving Manager

12 Rugby

13 David Seitz - Director of Loss Prevention

14 Kim Babka - Regional Director

15 Kristi Mogel - Regional Human Resources Manager

16 Cathy Post, General Manager

17 Tara Hladun - General Manager

18 Jenn Loob - Assistant Manager Operations

19
20 SPECIAL INTERROGATORY NO. 211

21 If YOU contend that YOUR practices pertaining to loss prevention inspections of YOUR
22 employees in YOUR "Ralph Lauren" stores (See Exhibit B, "Ralph. Lauren Store Locations" printout
23 from www.polo.com) differed from store to store in any way between May 30, 2002 and the present,
24 describe those differences in detail.

25 RESPONSE TO SPECIAL INTERROGATORY NO. 211

26 See Response to Special Interrogatory No. 209.

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1 SPECIAL INTERROGATORY NO. 212

2 IDENTIFY the person or persons most knowledgeable regarding YOUR response to the
3 immediately preceding interrogatory.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 212

5 See Response to Special Interrogatory No. 210.

6 SPECIAL INTERROGATORY NO. 213

7 If YOU contend that YOUR policies pertaining to loss prevention inspections of YOUR
8 employees in YOUR "Factory Stores" (See Exhibit B, "Ralph Lauren Store Locations" printout from
9 www.polo.com) differed from store to store in any way between May 30, 2002 and the present
10 describe those differences in detail.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 213

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome, is compound in nature, and is unduly burdensome and oppressive. Defendants further
14 object to this interrogatory as vague, ambiguous and overbroad, and unintelligible as to the terms
15 "policies," "Factory Stores," "differed from store to store in any way" and as to time. Finally,
16 Defendants object on the basis that the interrogatory erroneously refers to "Exhibit B, 'Ralph Lauren
17 Store Locations'".

18 Subject to and without waiving these objections and assuming Plaintiffs are referring to
19 "Exhibit A" for Polo Ralph Lauren Factory Stores in California, Defendants respond as follow:

20 Alpine

21 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
22 Handbook" that provides:

23 All packages are subject to inspection by Store Management.
24 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

25 The Company reserves the right to randomly inspect all shopping bags,
26 briefcases, totes, handbags or other items taken from the store as well
as work areas and lockers. Such inspections are a condition of
employment.

27 There is one patron exit to the store which is located at the front of the store and also serves as
28 the employee exit. There is also an emergency exit located in the back house of the store that is also

1 used for trash removal. Only managers, including the General Manager, Assistant Managers and
2 supervisor have the authority to excuse a Sales Associate from the store and perform a bag inspection
3 search. The bag inspection search only applies to all packages, including, but not limited to, shopping
4 bags, briefcases, totes and handbags that are in the possession of the Sales Associate when he/she
5 exits the store at any given time.

6 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
7 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
8 Sales Associates tend to locate that manager to excuse them from the store. Although there is no
9 formal policy for when a Sales Associate must clock-out but, generally Sales Associates clock-out
10 when they leave the sales floor to gather their personal belongings from the back house.

11 Once a manager has been located and informed that the Sales Associate wishes to leave the
12 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
13 inspection search.

14 All managers when inspecting packages, including, but not limited to, shopping bags,
15 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
16 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
17 within the package but may ask the Sales Associate to open compartments and move items around so
18 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
19 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
20 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

21 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
22 Associates usually exit the store with the closing manager. The closing manager usually takes
23 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
24 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
25 the manager.

26 Anderson

27 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
28 Handbook" that provides:

1 All packages are subject to inspection by Store Management.
2 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

3 The Company reserves the right to randomly inspect all shopping bags,
4 briefcases, totes, handbags or other items taken from the store as well
as work areas and lockers. Such inspections are a condition of
5 employment.

6 There is one patron exit to the store which is located at the front of the store. There is also an
7 emergency exit located in the back house of the store which is also used as a shipping and receiving
8 door. Only managers, including the General Manager, Assistant Managers and supervisor have the
9 authority to excuse a Sales Associate from the store and perform a bag inspection search. The bag
10 inspection search only applies to all packages, including, but not limited to, shopping bags,
11 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
store at any given time.

12 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
13 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
14 Sales Associates tend to locate that manager to excuse them from the store. Although there is no
15 formal policy for when a Sales Associate must clock-out but, generally Sales Associates clock-out
16 after they have gathered their personal belongings from the back house and but prior to the loss
17 prevention search and exiting the store.

18 Once a manager has been located and informed that the Sales Associate wishes to leave the
19 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
20 inspection search.

21 All managers when inspecting packages, including, but not limited to, shopping bags,
22 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
23 store, will ask to look inside the interior of all packages. In addition, if the Sales Associate is carrying
24 items of clothing, such as a jacket, the jacket will be pat down while the employee is holding it. The
25 manager does not touch any of the items within the package but may ask the Sales Associate to open
26 compartments and move items around so that they may gain a clearer view of the contents. Generally,
27 when a Sales Associate exits the store without any package(s) on him/her, a manager will give
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1 him/her permission to leave and will observe the Sales Associate walking out without immediately
2 escorting the Sales Associate to the exit.

3 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
4 Associates usually exit the store with the closing manager. The closing manager usually takes
5 responsibility for performing the loss prevention searches. Sales Associates first retrieve their
6 personal items from the back house of the store, clock-out, then are inspected by the manager
7 immediately prior to exiting the store.

8 Barstow

9 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
10 Handbook" that provides:

11 All packages are subject to inspection by Store Management.
12 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

13 The Company reserves the right to randomly inspect all shopping bags,
14 briefcases, totes, handbags or other items taken from the store as well
as work areas and lockers. Such inspections are a condition of
15 employment.

16 There are two patron entrances/exits to the store, one which is located in the children's and
home department and the other, located in the women's department. There are also two emergency
17 exits located in the back house of the store, one of which also is used to remove trash from the store.
18 At present, employees are required to enter and exit the store using the door that is located in the
19 children's and home department. Only managers, including the General Manager, Assistant
20 Managers and supervisors have the authority to excuse a Sales Associate from the store and perform
21 a bag inspection search. The bag inspection search only applies to all packages, including, but not
22 limited to, shopping bags, briefcases, totes and handbags that are in the possession of the Sales
23 Associate when he/she exits the store at any given time.

24 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
25 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
26 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
27 Although there is no formal policy for when a Sales Associate must clock-out, generally Sales
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1 Associates clock-out when they leave the sales floor, gather their personal belongings, then are
2 escorted to the door by a manager.

3 Once a manager has been located and informed that the Sales Associate wishes to leave the
4 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
5 inspection search.

6 All managers when inspecting packages, including, but not limited to, shopping bags,
7 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
8 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
9 within the package but may ask the Sales Associate to open compartments and move items around so
10 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
11 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
12 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

13 When Sales Associate is leaving at the end of the day, Sales Associates clock-out, gather their
14 personal belongings and then locate a manager to perform the bag inspection search prior to leaving
15 the store.

16 Cabazon

17 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
18 Handbook" that provides:

19 All packages are subject to inspection by Store Management.
20 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

21 The Company reserves the right to randomly inspect all shopping bags,
22 briefcases, totes, handbags or other items taken from the store as well
23 as work areas and lockers. Such inspections are a condition of
employment.

24 There are two patron entrances/exits to the store which are located next to each other at the
25 front of the store. There is also an emergency exit located in the back house of the store. At present,
26 employees are required to enter and exit the store using the door that is located on the right when
27 facing the store. Only managers, including the General Manager, Assistant Managers and supervisors
28 have the authority to excuse a Sales Associate from the store and perform a bag inspection search.

1 The bag inspection search only applies to all packages, including, but not limited to, shopping bags,
2 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
3 store at any given time.

4 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
5 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
6 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
7 Although there is no formal policy for when a Sales Associate must clock-out, generally Sales
8 Associates clock-out when they leave the sales floor to gather their personal belongings from the
9 back house. However, without a firm policy in place, some Sales Associates clock-out after they have
10 gathered their personal belongings and are ready to leave, either before or soon after locating a
11 manager.

12 Once a manager has been located and informed that the Sales Associate wishes to leave the
13 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
14 inspection search.

15 All managers when inspecting packages, including, but not limited to, shopping bags,
16 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
17 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
18 within the package but may ask the Sales Associate to open compartments and move items around so
19 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
20 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
21 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

22 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
23 Associates usually exit the store with the closing manager. The closing manager usually takes
24 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
25 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
26 the manager.

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Camarillo

The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee Handbook" that provides:

All packages are subject to inspection by Store Management. Inspections will be conducted at the employee entrances and exits. A sales receipt must accompany all purchases made by employees.

The Company reserves the right to randomly inspect all shopping bags, briefcases, totes, handbags or other items taken from the store as well as work areas and lockers. Such inspections are a condition of employment.

There are two patron entrances/exits to the store which are located next to each other at the front of the store. There is also an emergency exit located in the back house of the store. Sales Associates enter and exit the store using the door that is located on the right when facing the store. Only managers, including the General Manager, Assistant Managers and supervisors have the authority to excuse a Sales Associate from the store and perform a bag inspection search. The bag inspection search only applies to all packages, including, but not limited to, shopping bags, briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the store at any given time.

When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times, Sales Associates can generally can locate that manager easily to perform the bag inspection search. Although there is no formal policy for when a Sales Associate must clock-out but, generally Sales Associates clock-out when they leave the sales floor to gather their personal belongings from the back house. However, without a firm policy in place, some Sales Associates clock-out after they have gathered their personal belongings and are ready to leave, either before or soon after locating a manager.

Once a manager has been located and informed that the Sales Associate wishes to leave the store, the manager will then escort the Sales Associate to the employee exit to perform the bag inspection search.

All managers when inspecting packages, including, but not limited to, shopping bags, briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the

1 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
 2 within the package but may ask the Sales Associate to open compartments and move items around so
 3 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
 4 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
 5 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

6 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
 7 Associates usually exit the store with the closing manager. The closing manager usually takes
 8 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
 9 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
 10 the manager.

11 Carlsbad

12 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
 13 Handbook" that provides:

14 All packages are subject to inspection by Store Management.
 15 Inspections will be conducted at the employee entrances and exits. A
 sales receipt must accompany all purchases made by employees.

16 The Company reserves the right to randomly inspect all shopping bags,
 17 briefcases, totes, handbags or other items taken from the store as well
 as work areas and lockers. Such inspections are a condition of
 18 employment.

19 There are two patron exits to the store which are located next to each other at the front of the
 20 store. There is also an emergency exit located in the back house of the store. At present, employees
 21 are required to enter and exit the store using the door that is located on the far left when facing the
 22 store. Only managers, including the General Manager, Assistant Managers and supervisors have the
 23 authority to excuse a Sales Associate from the store and perform a bag inspection search. The bag
 24 inspection search only applies to all packages, including, but not limited to, shopping bags,
 25 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
 26 store at any given time.

27 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
 28 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,

1 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
2 Although there is no formal policy for when a Sales Associate must clock-out but, generally Sales
3 Associates clock-out when they leave the sales floor to gather their personal belongings from the
4 back house. However, without a firm policy in place, some Sales Associates clock-out after they have
5 gathered their personal belongings and are ready to leave, either before or soon after locating a
6 manager.

7 Once a manager has been located and informed that the Sales Associate wishes to leave the
8 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
9 inspection search.

10 All managers when inspecting packages, including, but not limited to, shopping bags,
11 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
12 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
13 within the package but may ask the Sales Associate to open compartments and move items around so
14 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
15 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
16 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

17 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
18 Associates usually exit the store with the closing manager. The closing manager usually takes
19 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
20 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
21 the manager.

22 Gilroy

23 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
24 Handbook" that provides:

25 All packages are subject to inspection by Store Management.
26 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

27 The Company reserves the right to randomly inspect all shopping bags,
28 briefcases, totes, handbags or other items taken from the store as well

1 as work areas and lockers. Such inspections are a condition of
2 employment.

3 There are two patron exits to the store which are located next to each other at the front of the
4 store. There are also three exits located at the back of the store, two of which are emergency exits and
5 the third which is used for shipping and receiving. At present, employees are required to enter and
6 exit the store using the patron door located in the women's department. Only managers, including the
7 General Manager, Assistant Managers and supervisors have the authority to excuse a Sales Associate
8 from the store and perform a bag inspection search. The bag inspection search only applies to all
9 packages, including, but not limited to, shopping bags, briefcases, totes and handbags that are in the
10 possession of the Sales Associate when he/she exits the store at any given time.

11 When a Sales Associate is prepared to leave the store, he/she will inform a manager. At least
12 two managers are on the sales floor at all times, so Sales Associates tend to locate one of those
13 managers to excuse them from the store. Although there is no formal policy for when a Sales
14 Associate must clock-out but, generally Sales Associates clock-out prior to leaving the sales floor to
15 gather their personal belongings from the back house. However, without a firm policy in place, some
16 Sales Associates clock-out after they have gathered their personal belongings and are ready to leave,
17 either before or soon after locating a manager.

18 Once a manager has been located and informed that the Sales Associate wishes to leave the
19 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
20 inspection search.

21 All managers when inspecting packages, including, but not limited to, shopping bags,
22 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
23 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
24 within the package but may ask the Sales Associate to open compartments and move items around so
25 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
26 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
27 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

28 Employees are not permitted to wear jackets out of the store. Jackets must be carried out of the store.

1 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
 2 Associates usually exit the store with the closing manager. The closing manager usually takes
 3 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
 4 leave, they clock-out, gather their personal belongings, then congregate near the front exit of the store
 5 and are one-by-one inspected by the manager.

6 Mammoth Lakes

7 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
 8 Handbook" that provides:

9 All packages are subject to inspection by Store Management.
 10 Inspections will be conducted at the employee entrances and exits. A
 sales receipt must accompany all purchases made by employees.

11 The Company reserves the right to randomly inspect all shopping bags,
 12 briefcases, totes, handbags or other items taken from the store as well
 as work areas and lockers. Such inspections are a condition of
 employment.

13 There is one patron exit to the store which is located at the front of the store. There are also
 14 two emergency exits located in the back house of the store. Sales Associates exit the store using the
 15 front exit. Only managers, including the General Manager, Assistant Managers and supervisors have
 16 the authority to excuse a Sales Associate from the store and perform a bag inspection search. The bag
 17 inspection search only applies to all packages, including, but not limited to, shopping bags,
 18 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
 19 store at any given time.

20 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
 21 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
 22 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
 23 There is no formalized system for when a Sales Associate must clock-out, either before or after
 24 finding a manager to excuse him/her from the store. Some Sales Associates clock-out when they
 25 leave the sales floor to gather their personal belongings from the back house and some Sales
 26 Associates clock-out after they have gathered their personal belongings and are ready to leave, either
 27 before or soon after locating a manager.
 28

1 Once a manager has been located and informed that the Sales Associate wishes to leave the
2 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
3 inspection search.

4 All managers when inspecting packages, including, but not limited to, shopping bags,
5 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
6 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
7 within the package but may ask the Sales Associate to open compartments and move items around so
8 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
9 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
10 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

11 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
12 Associates usually exit the store with the closing manager. The closing manager usually takes
13 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
14 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
15 the manager.

16 Ontario

17 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
18 Handbook" that provides:

19 All packages are subject to inspection by Store Management.
20 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

21 The Company reserves the right to randomly inspect all shopping bags,
22 briefcases, totes, handbags or other items taken from the store as well
23 as work areas and lockers. Such inspections are a condition of
employment.

24 There are two patron exits to the store. The front exit is located in the interior of the mall. The
25 second exits is located on the side of the store exits outside of the mall. There is also an emergency
26 exit located in the back house of the store. At present, employees are required to enter and exit the
27 store using the door that is located on the side of the mall, exiting outside the mall. Only managers,
28 including the General Manager, Assistant Managers and supervisors have the authority to excuse a

1 Sales Associate from the store and perform a bag inspection search. The bag inspection search only
2 applies to all packages, including, but not limited to, shopping bags, briefcases, totes and handbags
3 that are in the possession of the Sales Associate when he/she exits the store at any given time.

4 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
5 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
6 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
7 Although there is no formal policy for when a Sales Associate must clock-out but, Sales Associates
8 are generally required to clock-out prior to leaving the sales floor.

9 Once a manager has been located and informed that the Sales Associate wishes to leave the
10 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
11 inspection search.

12 All managers when inspecting packages, including, but not limited to, shopping bags,
13 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
14 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
15 within the package but may ask the Sales Associate to open compartments and move items around so
16 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
17 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
18 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

19 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
20 Associates usually exit the store with the closing manager. The closing manager usually takes
21 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
22 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
23 the manager.

24 Pismo Beach

25 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
26 Handbook" that provides:

27 All packages are subject to inspection by Store Management.
28 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

1 The Company reserves the right to randomly inspect all shopping bags,
2 briefcases, totes, handbags or other items taken from the store as well
3 as work areas and lockers. Such inspections are a condition of
employment.

4 There are two patron exits to the store which are located at the front of the store. There are
5 also two exits located at the back of the store, one is used for emptying trash and one is used for
6 shipping and receiving. Both back door exits are also designated emergency exits At present,
7 employees are required to enter and exit the store using the door that is located in the women's
8 department . Only managers, including the General Manager, Assistant Managers and supervisors
9 have the authority to excuse a Sales Associate from the store and perform a bag inspection search.
10 The bag inspection search only applies to all packages, including, but not limited to, shopping bags,
11 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
store at any given time.

12 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
13 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
14 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
15 Although there is no formal policy for when a Sales Associate must clock-out but, generally Sales
16 Associates clock-out when they leave the sales floor to gather their personal belongings from the
17 back house.

18 Once a manager has been located and informed that the Sales Associate wishes to leave the
19 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
20 inspection search.

21 All managers when inspecting packages, including, but not limited to, shopping bags,
22 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
23 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
24 within the package but may ask the Sales Associate to open compartments and move items around so
25 that they may gain a clearer view of the contents. In addition, if the Sales Associate is carrying items
26 of clothing, such as a jacket, the jacket will be pat down while the employee is holding it. Generally,
27 when a Sales Associate exits the store without any package(s) on him/her, a manager will give
28

1 him/her permission to leave and will observe the Sales Associate walking out without immediately
2 escorting the Sales Associate to the exit.

3 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
4 Associates usually exit the store with the closing manager. The Sales Associates gather their
5 belongings, bring them up front, then clock out together prior to being inspected by a manager.

6 San Diego

7 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
8 Handbook" that provides:

9 All packages are subject to inspection by Store Management.
10 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

11 The Company reserves the right to randomly inspect all shopping bags,
12 briefcases, totes, handbags or other items taken from the store as well
as work areas and lockers. Such inspections are a condition of
13 employment.

14 There are two patron exits to the store, one on the left that faces the parking lot and the other
15 on the right which faces the outdoor mall. There is also an emergency exit located in the back house
16 of the store. At present, employees are required to enter and exit the store using the door that faces
17 the parking lot. Only managers, including the General Manager, Assistant Managers and supervisors
18 have the authority to excuse a Sales Associate from the store and perform a bag inspection search.
19 The bag inspection search only applies to all packages, including, but not limited to, shopping bags,
20 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
store at any given time.

21 When a Sales Associate is prepared to leave the store, he/she will inform a manager that
22 he/she wishes to leave, which is broadcast over the walkie-talkie communication system in place in
23 the store. In the evening hours, after an employee has notified a manager that he/she wishes to leave,
24 there is usually no broadcast made over the walkie-talkie communication system since the store is
25 usually closed. The Sales Associate then proceeds to clock-out, then gather his/her belongings at the
26 back of the store in the employee locker area.
27
28

1 Once a manager has been located and informed that the Sales Associate wishes to leave the
 2 store, the manager will meet the Sales Associate at the employee exit to perform the bag inspection
 3 search. The store's security camera is pointed to the front of the store which includes the area where
 4 bag inspection searches are performed.

5 All managers when inspecting packages, including, but not limited to, shopping bags,
 6 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
 7 store, will hold the bottom of the package while instructing the employee to move around the
 8 contents of the package. Generally, when a Sales Associate exits the store without any package(s) on
 9 him/her, a manager will give him/her permission to leave and will observe the Sales Associate
 10 walking out without immediately escorting the Sales Associate to the exit.

11 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
 12 Associates usually exit the store with the closing manager. The closing manager usually takes
 13 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
 14 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
 15 the manager.

16 Tulare

17 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
 18 Handbook" that provides:

19 All packages are subject to inspection by Store Management.
 20 Inspections will be conducted at the employee entrances and exits. A
 sales receipt must accompany all purchases made by employees.

21 The Company reserves the right to randomly inspect all shopping bags,
 22 briefcases, totes, handbags or other items taken from the store as well
 23 as work areas and lockers. Such inspections are a condition of
 employment.

24 There are two patron exits to the store which are located at the front of the store, one in the
 25 women's department and one in the men's department. At present, the door located in the men's
 26 department is the designated employee entrance/exit. There are also two exits located in the back
 27 house of the store that are emergency exits and one is used for shipping and receiving. Only
 28 managers, including the General Manager, Assistant Managers and supervisor have the authority to

1 excuse a Sales Associate from the store and perform a bag inspection search. The bag inspection
2 search only applies to all packages, including, but not limited to, shopping bags, briefcases, totes and
3 handbags that are in the possession of the Sales Associate when he/she exits the store at any given
4 time.

5 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
6 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
7 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
8 Although there is no formal policy for when a Sales Associate must clock-out but, generally Sales
9 Associates clock-out after gathering their personal belongings from the back house and prior to
10 undergoing the loss prevention search and exiting the store.

11 Once a manager has been located and informed that the Sales Associate wishes to leave the
12 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
13 inspection search.

14 All managers when inspecting packages, including, but not limited to, shopping bags,
15 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
16 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
17 within the package but may ask the Sales Associate to open compartments and move items around so
18 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
19 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
20 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

21 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
22 Associates usually exit the store with the closing manager. The closing manager usually takes
23 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
24 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
25 the manager.

26 Vacaville

27 The store abides by the "Bag Inspection" policy that is enumerated in the "Retail Employee
28 Handbook" that provides:

1 All packages are subject to inspection by Store Management.
2 Inspections will be conducted at the employee entrances and exits. A
sales receipt must accompany all purchases made by employees.

3 The Company reserves the right to randomly inspect all shopping bags,
4 briefcases, totes, handbags or other items taken from the store as well
as work areas and lockers. Such inspections are a condition of
5 employment.

6 There are two patron exits to the store which are located on opposite sides of the cash wrap in
the store. Sales Associates exit the building through the door located in the men's department. There
7 are also two exits at the back house of the store that are emergency exits and used for shipping and
8 receiving. Sales Associates enter and exit the store using the door that is located on the right when
9 facing the store. Only managers, including the General Manager, Assistant Managers and supervisor
10 have the authority to excuse a Sales Associate from the store and perform a bag inspection search.
11 The bag inspection search only applies to all packages, including, but not limited to, shopping bags,
12 briefcases, totes and handbags that are in the possession of the Sales Associate when he/she exits the
13 store at any given time.

14 When a Sales Associate is prepared to leave the store, he/she will inform a manager. Since
15 there is a designated manager, the Customer Sales Manager (CSM), on the sales floor at all times,
16 Sales Associates can generally can locate that manager easily to perform the bag inspection search.
17 Although there is no formal policy for when a Sales Associate must clock-out but, generally Sales
18 Associates clock-out when they leave the sales floor to gather their personal belongings from the
19 back house. However, without a firm policy in place, some Sales Associates clock-out after they have
20 gathered their personal belongings and are ready to leave, either before or soon after locating a
21 manager.

22 Once a manager has been located and informed that the Sales Associate wishes to leave the
23 store, the manager will then escort the Sales Associate to the employee exit to perform the bag
24 inspection search.

25 All managers when inspecting packages, including, but not limited to, shopping bags,
26 briefcases, totes and handbags that are in the possession of the Sales Associate wishing to exit the
27 store, will ask to look inside the interior of all packages. The manager does not touch any of the items
28

1 within the package but may ask the Sales Associate to open compartments and move items around so
2 that they may gain a clearer view of the contents. Generally, when a Sales Associate exits the store
3 without any package(s) on him/her, a manager will give him/her permission to leave and will observe
4 the Sales Associate walking out without immediately escorting the Sales Associate to the exit.

5 When a Sales Associate is leaving at the end of the day, after the store has closed, the Sales
6 Associates usually exit the store with the closing manager. The closing manager usually takes
7 responsibility for performing the loss prevention searches. When the Sales Associates are prepared to
8 leave, they clock-out, then congregate near the front exit of the store and are one-by-one inspected by
9 the manager.

10 Vacaville - Polo Jeans Co.

11 Loss prevention searches are no longer performed in this store because the store is no longer
12 in operation.

13 Camarillo - Polo Jeans Co.

14 Loss prevention searches are no longer performed in this store because the store is no longer
15 in operation.

16 Gilroy - Polo Jeans Co.

17 Loss prevention searches are no longer performed in this store because the store is no longer
18 in operation.

19 San Diego - Polo Jeans Co.

20 Loss prevention searches are no longer performed in this store because the store is no longer
21 in operation.

22 SPECIAL INTERROGATORY NO. 214

23 IDENTIFY the person or persons most knowledgeable regarding YOUR response to the
24 immediately preceding interrogatory.

25 RESPONSE TO SPECIAL INTERROGATORY NO. 214

26 Defendants object to this interrogatory on the grounds that it is vague, ambiguous and overly
27 broad, is compound in nature, and is unduly burdensome and oppressive.

28 Subject to and without waiving these objections, Defendants respond as follow:

Alpine

Sharonda Weatherspoon - Director of Human Resources - FSC Stores

Scott Kafoury - District Manager for Southern California

Everett Ferrieria - General Manager

Carol Ann Umbrasas - Assistant Manager Merchandising

Jason Waters - Assistant Manager Human Resources

Mark Dubois - Assistant Manager Operations

Anderson

Sharonda Weatherspoon - Director of Human Resources - FSC Stores

Tracy Ficklin Wagner - District Manager for Northwest

Dian Sharp - General Manager

Heather Wyatt - Assistant Manager Merchandising

Kathryn Mattson - Assistant Manager Human Resources

Sarah Matthews - Assistant Manager Operations

Barstow

Sharonda Weatherspoon, Director of Human Resources - FSC Stores

Matt Peyton - District Manager for Southwest

Tanya Taylor - General Manager

Adrian Pina - Assistant Manager Merchandising

Felisha Jones - Assistant Manager Human Resources

John Serrano - Assistant Manager Operations

Cabazon

Sharonda Weatherspoon - Director of Human Resources - FSC Stores

Scott Kafoury - District Manager for Southern California

Mike Ko - Store Director

April Hicks - General Manager

Cynthia Mora - Assistant Manager Merchandising Men's and Home

Leighann Arizmendi - Assistant Manager Women and Kids

1 Alyssa Julian - Assistant Manager Human Resources

2 Alex Herrera - Assistant Manager Operations

3 Camarillo

4 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

5 Matt Peyton - District Manager for Southwest

6 Lianne Ishiagawa -General Manager

7 Mario Cadena - Assistant Manager Merchandising Men's and Home

8 Jennifer Wemeke - Assistant Manager Women's and Kids

9 Michelle Meyers - Assistant Manager Human Resources

10 Darlene Villavicencio - Assistant Manager Operations

11 Carlsbad

12 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

13 Scott Kafoury - District Manager for Southern California

14 Nancy Hong - General Manager

15 Joseph Santapaoloa - Assistant Manager Men's and Home

16 Jennifer Hanson - Assistant Manager Women's and Kids

17 Emily Broker - Assistant Manager Human Resources

18 Abel Manansala - Assistant Manager Operations

19 Gilroy

20 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

21 Tracy Ficklin Wagner - District Manager for Northwest

22 John Navarro - General Manager

23 Loren Johnson - Assistant Manager Human Resources

24 Mammoth Lakes

25 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

26 Tracy Ficklin Wagner - District Manager for Northwest

27 Tara Wright - General Manager

28 Thomas Richards - Assistant Manager Merchandising Men's and Home

1 Sandra Brodie - Assistant Manager Merchandising Women's and Kids

2 Brandon Willis - Assistant Manager Human Resources

3 Ontario

4 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

5 Diana Copeland - Regional Manager, Western Region

6 Scott Kafoury - District Manager for Southern California

7 Andrea Williams - General Manager

8 Rachel Delamora - Assistant Manager Merchandising

9 Dena Braxton - Assistant Manager Human Resources

10 Jessica Hipol - Assistant Manager Operations

11 Pismo Beach

12 Matt Peyton - District Manager for Southwest

13 Joey Sandoval - General Manager

14 Nick Williams - Assistant Manager Merchandising

15 Carin Penninski - Assistant Manager Human Resources

16 Michelle Torez - Assistant Manager Operations

17 San Diego

18 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

19 Scott Kafoury - District Manager for Southern California

20 Carey Hernandez - General Manager

21 Ivy Mighty - Assistant Manager Merchandising

22 Jeffrey Jimenez - Assistant Manager Human Resources

23 Daniel Murphy - Assistant Manager Operations

24 Tulare

25 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

26 Matt Peyton - District Manager for Southwest

27 David Botello - General Manager

28 Valentina Paloma - Assistant Manager Merchandising

1 Spencer Vandergriff - Assistant Manager Human Resources

2 Tiffany Crawford - Assistant Manager Operations

3 Vacaville

4 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

5 Tracy Ficklin Wagner - District Manager Northwest

6 Denny Howe - General Manager

7 Megan Roos - Assistant Manager Merchandising Men's and Home

8 Tony Cichy - Assistant Manager Women's and Kids

9 Shari Foree - Assistant Manager Human Resources

10 Will Henderson - Assistant Manager Operations

11 Vacaville - Polo Jeans Co.

12 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

13 Camarillo - Polo Jeans Co.

14 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

15 Gilroy - Polo Jeans Co.

16 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

17 San Diego - Polo Jeans Co.

18 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

19 SPECIAL INTERROGATORY NO. 215

20 If YOU contend YOUR practices pertaining to loss prevention inspections of YOUR
21 employees in YOUR "Factory Stores" (See Exhibit B, "Ralph Lauren Store Locations" printout from
22 www.polo.com) differed from store to store in any way between May 30, 2002 and the present,
23 describe those differences in detail.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 215

25 See Response to Special Interrogatory No. 213.

26 SPECIAL INTERROGATORY NO. 216

27 IDENTIFY the person or persons most knowledgeable regarding YOUR response to the
28 immediately preceding interrogatory.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 216

2 See Response to Special Interrogatory No. 214.

3 SPECIAL INTERROGATORY NO. 217

4 IDENTIFY the person or persons most knowledgeable about YOUR payment
5 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Rodeo Drive store in
6 Beverly Hills, California. (For purposes of these interrogatories, "COMPENSATION" means any
7 form of compensation received by your SALES ASSOCIATES, including but not limited to wages,
8 commissions, bonuses, and medical, dental and/or vision insurance.)

9 RESPONSE TO SPECIAL INTERROGATORY NO. 217

10 Defendants object to this interrogatory on the grounds that it is vague, ambiguous and overly
11 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
12 and ambiguous.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

15 Kim Babka - Regional Director

16 Kristi Mogel - Regional Human Resources Manager

17 Jonathan Possidente - General Manager

18 SPECIAL INTERROGATORY NO. 218

19 IDENTIFY the person or persons most knowledgeable about YOUR payment of
20 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Burlingame Avenue
21 store in Burlingame, California.

22 RESPONSE TO SPECIAL INTERROGATORY NO. 218

23 Defendants object to this interrogatory on the grounds that it is vague, ambiguous and overly
24 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
25 and ambiguous.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

28 Kim Babka - Regional Director

1 Kristi Mogel - Regional Human Resources Manager

2 Tin Hua - former Area Manager

3 SPECIAL INTERROGATORY NO. 219

4 IDENTIFY the person or persons most knowledgeable about YOUR payment of
5 COMPENSATION to SALES ASSOCIATES currently employed in YOUR South Coast Plaza store
6 in Costa Mesa, California.

7 RESPONSE TO SPECIAL INTERROGATORY NO. 219

8 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
9 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
10 and ambiguous.

11 Subject to and without waiving these objections, Defendants respond as follow:

12 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

13 Kim Babka - Regional Director

14 Kristi Mogel - Regional Human Resources Manager

15 Gary Morrill, former General Manager

16 SPECIAL INTERROGATORY NO. 220

17 IDENTIFY the person or persons most knowledgeable about YOUR. payment of
18 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Girard Avenue store in
19 La Jolla, California.

20 RESPONSE TO SPECIAL INTERROGATORY NO. 220

21 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
22 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
23 and ambiguous.

24 Subject to and without waiving these objections, Defendants respond as follow:

25 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

26 Kim Babka - Regional Director

27 Kristi Mogel - Regional Human Resources Manager

28 Brooke Stengel - General Manager

1 SPECIAL INTERROGATORY NO. 221

2 IDENTIFY the person or persons most knowledgeable about YOUR payment of
3 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Malibu Ralph Lauren
4 store.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 221

6 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
7 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
8 and ambiguous.

9 Subject to and without waiving these objections, Defendants respond as follow:

10 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

11 Kim Babka - Regional Director

12 Kristi Mogel - Regional Human Resources Manager

13 Jenna Baker - General Manager

14 SPECIAL INTERROGATORY NO. 222

15 IDENTIFY the person or persons most knowledgeable about YOUR payment of
16 compensation to SALES ASSOCIATES currently employed in YOUR Ralph Lauren Stanford
17 Shopping Center store in Palo Alto, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 222

19 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
20 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
21 and ambiguous.

22 Subject to and without waiving these objections, Defendants respond as follow:

23 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

24 Kim Babka - Regional Director

25 Kristi Mogel - Regional Human Resources Manager

26 Tin Hua - former Area Manager

27 ///

28 ///

1 SPECIAL INTERROGATORY NO. 223

2 IDENTIFY the person or persons most knowledgeable about YOUR payment of
3 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Rugby store in Palo
4 Alto, California.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 223

6 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
7 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
8 and ambiguous.

9 Subject to and without waiving these objections, Defendants respond as follow:

10 Evan Cohen - Manager of Store Operations - Full Price Retail Stores

11 Kim Babka - Regional Director

12 Kristi Mogel - Regional Human Resources Manager

13 Tara Hladun - General Manager

14 SPECIAL INTERROGATORY NO. 224

15 IDENTIFY the person or persons most knowledgeable about YOUR payment of
16 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Pavilions Lane store in
17 Sacramento, California

18 RESPONSE TO SPECIAL INTERROGATORY NO. 224

19 Subject to and without waiving these objections, Defendants respond as follows:

20 The Sacramento store is owned by a licensee of Defendants and as a result, Defendants have
21 no knowledge or information to be able to respond to this request.

22 SPECIAL INTERROGATORY NO. 225

23 IDENTIFY the person or persons most knowledgeable about YOUR payment of
24 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Post Street Ralph
25 Lauren store in San Francisco, California.

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RESPONSE TO SPECIAL INTERROGATORY NO. 225

Defendants object to this interrogatory on the grounds that it vague ambiguous and overly broad as to time and scope. Defendants further object on the ground that the term "payment" is vague and ambiguous.

Subject to and without waiving these objections, Defendants respond as follow:

Evan Cohen - Manager of Store Operations - Full Price Retail Stores

Kim Babka - Regional Director

Kristi Mogel - Regional Human Resources Manager

Cathy Post - General Manager

Tin Hua - former Area Manager

SPECIAL INTERROGATORY NO. 226

IDENTIFY the person or persons most knowledgeable about YOUR payment of COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Larsen Factory Outlet store in Alpine, California.

RESPONSE TO SPECIAL INTERROGATORY NO. 226

Defendants object to this interrogatory on the grounds that it vague ambiguous and overly broad as to time and scope. Defendants further object on the ground that the term "payment" is vague and ambiguous.

Subject to and without waiving these objections, Defendants respond as follow:

Sharonda Weatherspoon - Director of Human Resources - FSC Stores

Diana Copeland - Regional Manager, Western Region

Scott Kafoury - District Manager for Southern California

Everett Ferrieria - General Manager

Jason Waters - Assistant Manager Human Resources

SPECIAL INTERROGATORY NO. 227

IDENTIFY the person or persons most knowledgeable about YOUR payment of COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren Factory Outlet store in Anderson, California.

RESPONSE TO SPECIAL INTERROGATORY NO. 227

Defendants object to this interrogatory on the grounds that it vague ambiguous and overly broad as to time and scope. Defendants further object on the ground that the term "payment" is vague and ambiguous.

Subject to and without waiving these objections, Defendants respond as follow:

Sharonda Weatherspoon - Director of Human Resources - FSC Stores

Diana Copeland - Regional Manager, Western Region

Tracy Ficklin Wagner - District Manager for Northwest

Dian Sharp - General Manager

Kathryn Mattson - Assistant Manager Human Resources

SPECIAL INTERROGATORY NO. 228

IDENTIFY the person or persons most knowledgeable about YOUR payment of COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren Factory Outlet store in Barstow, California.

RESPONSE TO SPECIAL INTERROGATORY NO. 228

Defendants object to this interrogatory on the grounds that it vague ambiguous and overly broad as to time and scope. Defendants further object on the ground that the term "payment" is vague and ambiguous.

Subject to and without waiving these objections, Defendants respond as follow:

Sharonda Weatherspoon - Director of Human Resources - FSC Stores

Diana Copeland - Regional Manager, Western Region

Matt Peyton - District Manager for Southwest

Tanya Taylor - General Manager

Felisha Jones - Assistant Manager Human Resources

SPECIAL INTERROGATORY NO. 229

IDENTIFY the person or persons most knowledgeable about YOUR payment of COMPENSATION to SALES ASSOCIATES currently employed in YOUR Palo Ralph Lauren Factory Outlet store in Cabazon, California.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 229

2 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
3 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
4 and ambiguous.

5 Subject to and without waiving these objections, Defendants respond as follow:

6 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

7 Diana Copeland - Regional Manager, Western Region

8 Scott Kafoury - District Manager for Southern California

9 Mike Ko - Store Director

10 April Hicks - General Manager

11 Alyssa Julian - Assistant Manager Human Resources

12 SPECIAL INTERROGATORY NO. 230

13 IDENTIFY the person or persons most knowledgeable about YOUR payment of
14 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
15 Factory Outlet store in Camarillo, California.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 230

17 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
18 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
19 and ambiguous.

20 Subject to and without waiving these objections, Defendants respond as follow:

21 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

22 Diana Copeland - Regional Manager, Western Region

23 Matt Peyton - District Manager for Southwest

24 Lianne Ishiagawa -General Manager

25 Michelle Meyers - Assistant Manager Human Resources

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1 SPECIAL INTERROGATORY NO. 231

2 IDENTIFY the person or persons most knowledgeable about YOUR payment of
3 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
4 Factory Outlet store in Carlsbad, California.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 231

6 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
7 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
8 and ambiguous.

9 Subject to and without waiving these objections, Defendants respond as follow:

10 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

11 Diana Copeland - Regional Manager, Western Region

12 Scott Kafoury - District Manager for Southern California

13 Nancy Hong - General Manager

14 Emily Broker - Assistant Manager Human Resources

15 SPECIAL INTERROGATORY NO. 232

16 IDENTIFY the person or persons most knowledgeable about YOUR payment of
17 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren.
18 Factory Outlet store in Gilroy, California.

19 RESPONSE TO SPECIAL INTERROGATORY NO. 232

20 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
21 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
22 and ambiguous.

23 Subject to and without waiving these objections, Defendants respond as follow:

24 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

25 Diana Copeland - Regional Manager, Western Region

26 Tracy Ficklin Wagner - District Manager for Northwest

27 John Navarro - General Manager

28 Loren Johnson - Assistant Manager Human Resources

1 SPECIAL INTERROGATORY NO. 233

2 IDENTIFY the person or persons most knowledgeable about YOUR payment of
3 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
4 Factory Outlet store in Mammoth Lakes, California.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 233

6 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
7 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
8 and ambiguous.

9 Subject to and without waiving these objections, Defendants respond as follow:

10 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

11 Diana Copeland - Regional Manager, Western Region

12 Tracy Ficklin Wagner - District Manager for Northwest

13 Tara Wright - General Manager

14 Brandon Willis - Assistant Manager Human Resources

15 SPECIAL INTERROGATORY NO. 234

16 IDENTIFY the person or persons most knowledgeable about YOUR payment of
17 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
18 Factory Outlet store in Ontario, California.

19 RESPONSE TO SPECIAL INTERROGATORY NO. 234

20 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
21 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
22 and ambiguous.

23 Subject to and without waiving these objections, Defendants respond as follow:

24 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

25 Diana Copeland - Regional Manager, Western Region

26 Scott Kafoury - District Manager for Southern California

27 Andrea Williams - General Manager

28 Dena Braxton - Assistant Manager Human Resources

1 SPECIAL INTERROGATORY NO. 235

2 IDENTIFY the person or persons most knowledgeable about YOUR payment of
3 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
4 Factory Outlet store in Pismo Beach, California.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 235

6 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
7 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
8 and ambiguous.

9 Subject to and without waiving these objections, Defendants respond as follow:

10 Matt Peyton - District Manager for Southwest

11 Diana Copeland - Regional Manager, Western Region

12 Joey Sandoval - General Manager

13 Carin Penninski - Assistant Manager Human Resources

14 SPECIAL INTERROGATORY NO. 236

15 IDENTIFY the person or persons most knowledgeable about YOUR payment of
16 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
17 Factory Outlet store in San Diego, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 236

19 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
20 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
21 and ambiguous.

22 Subject to and without waiving these objections, Defendants respond as follow:

23 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

24 Diana Copeland - Regional Manager, Western Region

25 Scott Kafoury - District Manager for Southern California

26 Carey Hernandez - General Manager

27 Jeffrey Jimenez - Assistant Manager Human Resources

28 SPECIAL INTERROGATORY NO. 237

1 IDENTIFY the person or persons most knowledgeable about YOUR payment of
 2 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
 3 Factory Outlet store in Tulare, California.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 237

5 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
 6 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
 7 and ambiguous.

8 Subject to and without waiving these objections, Defendants respond as follow:

9 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

10 Diana Copeland - Regional Manager, Western Region

11 Matt Peyton - District Manager for Southwest

12 David Botello - General Manager

13 Spencer Vandergriff - Assistant Manager Human Resources

14 SPECIAL INTERROGATORY NO. 238

15 IDENTIFY the person or persons most knowledgeable about YOUR payment of
 16 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Ralph Lauren
 17 Factory Outlet store in Vacaville, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 238

19 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
 20 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
 21 and ambiguous.

22 Subject to and without waiving these objections, Defendants respond as follow:

23 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

24 Diana Copeland - Regional Manager, Western Region

25 Tracy Ficklin Wagner - District Manager Northwest

26 Denny Howe, General Manager

27 Shari Foree, Assistant Manager Human Resources

28 ///

1 SPECIAL INTERROGATORY NO. 239

2 IDENTIFY the person or persons most knowledgeable about YOUR payment of
3 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Jeans Co. Factory
4 store in Cabazon, California.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 239

6 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
7 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
8 and ambiguous.

9 Subject to and without waiving these objections, Defendants respond as follow:

10 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

11 Scott Kafoury - District Manager Southern California

12 SPECIAL INTERROGATORY NO. 240

13 IDENTIFY the person or persons most knowledgeable about YOUR payment of
14 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Jeans Co. Factory
15 store in Camarillo, California.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 240

17 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
18 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
19 and ambiguous.

20 Subject to and without waiving these objections, Defendants respond as follow:

21 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

22 Matt Peyton - District Manager Southwest

23 SPECIAL INTERROGATORY NO. 241

24 IDENTIFY the person or persons most knowledgeable about YOUR payment of
25 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Jeans Co. Factory
26 store in Gilroy, California.

27 ///

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 241

2 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
3 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
4 and ambiguous.

5 Subject to and without waiving these objections, Defendants respond as follow:

6 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

7 Tracy Ficklin Wagner - District Manager Northwest

8 SPECIAL INTERROGATORY NO. 242

9 IDENTIFY the person or persons most knowledgeable about YOUR payment of
10 COMPENSATION to SALES ASSOCIATES currently employed in YOUR Polo Jeans Co. Factory
11 store in San Diego, California.

12 RESPONSE TO SPECIAL INTERROGATORY NO. 242

13 Defendants object to this interrogatory on the grounds that it vague ambiguous and overly
14 broad as to time and scope. Defendants further object on the ground that the term "payment" is vague
15 and ambiguous.

16 Subject to and without waiving these objections, Defendants respond as follow:

17 Sharonda Weatherspoon - Director of Human Resources - FSC Stores

18 Scott Kafoury - District Manager Southern California

19 SPECIAL INTERROGATORY NO. 243

20 Describe how CHARGE BACK POLICY currently is applied to SALES ASSOCIATES'
21 COMPENSATION in YOUR Ralph Lauren stores in California. (For purposes of these
22 interrogatories, "CHARGE BACK POLICY" means the policy pursuant to which a SALES
23 ASSOCIATE'S COMPENSATION is adjusted when a customer returns a product that SALES
24 ASSOCIATE has sold.)

25 RESPONSE TO SPECIAL INTERROGATORY NO. 243

26 Defendants object to this interrogatory on the grounds that the phrase "Ralph Lauren stores"
27 is overly broad, vague, ambiguous and calls for speculation. Defendants further object to the
28 definition of "charge back policy" which misstates the policy and is as such vague and ambiguous.

1 Finally, Defendants object on the ground that this request seeks information that is not relevant and is
2 not reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 A "chargeback" occurs when a client, who purchased his/her merchandise through the use of
5 a credit card, disagrees with the posted charge. When he/she instructs his/her credit card company to
6 stop payment, the result is a chargeback to Polo. This is distinct from the returns/exchanges policy
7 applicable only to sales associates who receive a base rate plus commission or base rate against
8 commission. The returns/exchanges policy provides the following:

- 9 • If a customer purchases product from Sales Associate A and returns the product, the return
10 is credited to Sales Associate A's number, regardless of the location of either the purchase
11 or return.
- 12 • All returns of damaged, defective, or mis-altered merchandise should be returned to the
13 original sales associate's number regardless of responsibility.
- 14 • If a customer purchases product from both Sales Associate A and Sales Associate B, all
15 returns of the product are credited to the applicable sales associate number.
- 16 • If a customer purchases product from Sales Associate A and returns the product to Sales
17 Associate B, the return is credited to Sales Associate A's employee number.
- 18 • If a customer purchases product from Sales Associate A and Sales Associate A is
19 unavailable or not working when the customer comes back, then Sales Associate B should
20 assist the customer.
- 21 • If the product is exchanged for a like item, then the product should be
22 returned and re-sold under Sales Associate A's number. For example, a
23 medium blue knit shirt is exchanged for a large red knit shirt.
- 24 • If the product is returned, then the product should be returned under Sales
25 Associate A's number.

26 In either case, if the customer selects additional merchandise or a different style of
27 product, then those items are considered new purchases and Sales Associate B should
28 receive commission for all new purchases.

- 1 • If the original sales associate is unknown, then the following principles apply:
 - 2 • If the product is exchanged for a like item, then the product should be
 - 3 returned and re-sold under the appropriate house number.
 - 4 • If the product is returned, then the product should be returned under the
 - 5 appropriate house number.

6 In either case, if the customer selects additional merchandise or a different style or
 7 product, then those items are considered new purchases and the sales associate should
 8 receive commission for all new purchases.

- 9 • If the product is returned from a department store, Polo.com or any of our factory stores every
 10 attempt should be made to identify the product and return it under the appropriate House
 11 Return designation.

12 SPECIAL INTERROGATORY NO. 244

13 Describe how YOUR CHARGE BACK POLICY is applied to SALES ASSOCIATES'
 14 wages, commissions and/or earnings in YOUR Rugby store in Palo Alto, California, at the present
 15 time.
 16

17 RESPONSE TO SPECIAL INTERROGATORY NO. 244

18 Defendants object to the definition of "charge back policy" which misstates the policy and is
 19 as such vague and ambiguous. Defendants further object to this interrogatory on the grounds that it is
 20 vague and ambiguous as no sales associate in this store is paid commission wages. Finally,
 21 Defendants object on the ground that this request seeks information that is not relevant and is not
 22 reasonably calculated to lead to the discovery of admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 There is no policy which exists in this store that adjusts a sales associate's compensation
 25 when a customer returns merchandise the sales associate had previously sold.

26 ///

27 ///

28 ///

1 SPECIAL INTERROGATORY NO. 245

2 Describe how YOUR CHARGE BACK POLICY is applied to SALES ASSOCIATES'
3 wages, commissions and/or earnings in YOUR Polo Ralph Lauren Factory stores in California at the
4 present time.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 245

6 Defendants object to this interrogatory on the grounds that the phrase "Polo Ralph Lauren
7 Factor stores" is overly broad, vague, ambiguous and calls for speculation. Defendants further object
8 to the definition of "charge back policy" which misstates the policy and is as such vague and
9 ambiguous. Finally, Defendants object on the ground that this request seeks information that is not
10 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 There is no policy which exists in any of the factory stores that adjusts a sales associate's
13 compensation when a customer returns merchandise the sales associate had previously sold.

14 SPECIAL INTERROGATORY NO. 246

15 Describe how YOUR CHARGE BACK POLICY is applied to SALES ASSOCIATES'
16 wages, commissions and/or earnings in YOUR Polo Jeans Co. Factory stores in California at the
17 present time.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 246

19 Defendants object to this interrogatory on the grounds that the phrase "Polo Jeans Co. Factory
20 stores" is overly broad, vague, ambiguous and calls for speculation. Defendants further object to the
21 definition of "charge back policy" which entirely misstates the policy. Defendants finally object on
22 the ground that this request seeks information that is not relevant and is not reasonably calculated to
23 lead to the discovery of admissible evidence since the interrogatory seeks information from a period
24 of time after business operations ceased in these stores.

25 Subject to and without waiving these objections, Defendants respond as follows:

26 There is no policy which exists in any of the factory stores that adjusts a sales associate's
27 compensation when a customer returns merchandise the sales associate had previously sold.

28 ///

1 SPECIAL INTERROGATORY NO. 247

2 IDENTIFY YOUR current Operations Manager in YOUR Burlingame Avenue store in
3 Burlingame, California. (For purposes of these interrogatories, "IDENTIFY" means to state the
4 applicable individual or entity's full name)

5 RESPONSE TO SPECIAL INTERROGATORY NO. 247

6 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
7 term "Operations Manager." Defendants further object on the ground that this request seeks
8 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Subject to and without waiving these objections, Defendants respond as follows:

11 There is no employee with the title "Operations Manager" in this store.

12 SPECIAL INTERROGATORY NO. 248

13 IDENTIFY YOUR current Operations Manager in YOUR South Coast Plaza store in Costa
14 Mesa, California.

15 RESPONSE TO SPECIAL INTERROGATORY NO. 248

16 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
17 term "Operations Manager." Defendants further object on the ground that this request seeks
18 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Subject to and without waiving these objections, Defendants respond as follows:

21 There is no employee with the title "Operations Manager" in this store.

22 SPECIAL INTERROGATORY NO. 249

23 IDENTIFY YOUR current Operations Manager in YOUR Girard Avenue store in La Jolla,
24 California.

25 RESPONSE TO SPECIAL INTERROGATORY NO. 249

26 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
27 term "Operations Manager." Defendants further object on the ground that this request seeks
28

1 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 There is no employee with the title "Operations Manager" in this store.

5 SPECIAL INTERROGATORY NO. 250

6 IDENTIFY YOUR current Operations Manager in YOUR Malibu Ralph Lauren store.

7 RESPONSE TO SPECIAL INTERROGATORY NO. 250

8 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
9 term "Operations Manager." Defendants further object on the ground that this request seeks
10 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Subject to and without waiving these objections, Defendants respond as follows:

13 There is no employee with the title "Operations Manager" in this store.

14 SPECIAL INTERROGATORY NO. 251

15 IDENTIFY YOUR current Operations Manager in YOUR Ralph Lauren Stanford Shopping
16 Center store in Palo Alto, California.

17 RESPONSE TO SPECIAL INTERROGATORY NO. 251

18 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
19 term "Operations Manager." Defendants further object on the ground that this request seeks
20 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiving these objections, Defendants respond as follows:

23 The Operations Manager is Jesus Valdovinos.

24 SPECIAL INTERROGATORY NO. 252

25 IDENTIFY YOUR current Operations Manager in YOUR Rugby store in Palo Alto,
26 California.

27 ///

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 252

2 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
3 term "Operations Manager." Defendants further object on the ground that this request seeks
4 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 The Assistant Manager Operations is Jenn Loob.

8 SPECIAL INTERROGATORY NO. 253

9 IDENTIFY YOUR current Operations Manager in YOUR Pavilions Lane store in
10 Sacramento, California

11 RESPONSE TO SPECIAL INTERROGATORY NO. 253

12 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
13 term "Operations Manager." Defendants further object on the ground that this request seeks
14 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 The Sacramento store is owned by a licensee of Defendants and as a result, Defendants have
18 no knowledge or information to be able to respond to this request.

19 SPECIAL INTERROGATORY NO. 254

20 IDENTIFY YOUR current Operations Manager in YOUR Post Street Ralph Lauren store in
21 San Francisco, California.

22 RESPONSE TO SPECIAL INTERROGATORY NO. 254

23 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
24 term "Operations Manager." Defendants further object on the ground that this request seeks
25 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
26 evidence.

27 Subject to and without waiving these objections, Defendants respond as follows:

28 The Operations Manager is Teresa Cruz.

1 SPECIAL INTERROGATORY NO. 255

2 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
3 store in Alpine, California.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 255

5 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
6 term "Operations Manager." Defendants further object on the ground that this request seeks
7 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 The Assistant Manager Operations is Mark Dubois.

11 SPECIAL INTERROGATORY NO. 256

12 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
13 store in Anderson, California.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 256

15 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
16 term "Operations Manager." Defendants further object on the ground that this request seeks
17 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 The Assistant Manager Operations is Sarah Matthews.

21 SPECIAL INTERROGATORY NO. 257

22 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
23 store in Barstow, California.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 257

25 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
26 term "Operations Manager." Defendants further object on the ground that this request seeks
27 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 The Assistant Manager Operations is John Serrano.

3 SPECIAL INTERROGATORY NO. 258

4 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
5 store in Cabazon, California.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 258

7 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
8 term "Operations Manager." Defendants further object on the ground that this request seeks
9 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 The Assistant Manager Operations is Alex Herrera.

13 SPECIAL INTERROGATORY NO. 259

14 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
15 store in Camarillo, California.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 259

17 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
18 term "Operations Manager." Defendants further object on the ground that this request seeks
19 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 The Assistant Manager Operations is Darlene Villavicencio

23 SPECIAL INTERROGATORY NO. 260

24 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
25 store in Carlsbad, California.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 260

27 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
28 term "Operations Manager." Defendants further object on the ground that this request seeks

1 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 The Assistant Manager Operations is Abel Manansala.

5 SPECIAL INTERROGATORY NO. 261

6 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
7 store in Gilroy, California.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 261

9 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
10 term "Operations Manager." Defendants further object on the ground that this request seeks
11 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 The Assistant Manager Operations is Anthony Velazquez.

15 SPECIAL INTERROGATORY NO. 262

16 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
17 store in Mammoth Lakes, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 262

19 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
20 term "Operations Manager." Defendants further object on the ground that this request seeks
21 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 The Assistant Manager Operations is Shana Thompson.

25 SPECIAL INTERROGATORY NO. 263

26 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
27 store in Ontario, California.

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 263

2 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
3 term "Operations Manager." Defendants further object on the ground that this request seeks
4 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 The Assistant Manager Operations is Jessica Hipol.

8 SPECIAL INTERROGATORY NO. 264

9 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
10 store in Pismo Beach, California.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 264

12 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
13 term "Operations Manager." Defendants further object on the ground that this request seeks
14 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 The Assistant Manager Operations is Michelle Torez.

18 SPECIAL INTERROGATORY NO. 265

19 IDENTIFY YOUR current Operations Manager in YOUR Burlingame Avenue store in
20 YOUR Polo Ralph Lauren Factory Outlet store in San Diego, California.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 265

22 Defendants object to this interrogatory on the grounds that it is vague, ambiguous and
23 unintelligible as to the "Burlingame Avenue store in YOUR Polo Ralph Lauren Factory Outlet store
24 in San Diego, California." Defendants further object to this interrogatory on the grounds that it is
25 vague and ambiguous as to the term "Operations Manager." Finally, Defendants object on the ground
26 that this request seeks information that is not relevant and is not reasonably calculated to lead to the
27 discovery of admissible evidence.

28 ///

1 Subject to and without waiving these objections, Defendants respond as follows:

2 The Assistant Manager Operations is Daniel Murphy.

3 SPECIAL INTERROGATORY NO. 266

4 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
5 store in Tulare, California.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 266

7 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
8 term "Operations Manager." Defendants further object on the ground that this request seeks
9 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 The Assistant Manager Operations is Tiffany Crawford.

13 SPECIAL INTERROGATORY NO. 267

14 IDENTIFY YOUR current Operations Manager in YOUR Polo Ralph Lauren Factory Outlet
15 store in Vacaville, California.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 267

17 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
18 term "Operations Manager." Defendants further object on the ground that this request seeks
19 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 The Assistant Manager Operations is Will Henderson.

23 SPECIAL INTERROGATORY NO. 268

24 IDENTIFY YOUR current Operations Manager in YOUR Polo Jeans Co. Factory store in
25 Cabazon, California.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 268

27 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
28 term "Operations Manager." Defendants further object on the ground that this request seeks

1 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 This store is now closed. Thus, there is no employee with the title of "Operations Manager."

5 SPECIAL INTERROGATORY NO. 269

6 IDENTIFY YOUR current Operations Manager in YOUR Polo Jeans Co. Factory store in
7 Camarillo, California.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 269

9 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
10 term "Operations Manager." Defendants further object on the ground that this request seeks
11 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
12 evidence since it seeks information regarding a store no longer doing business.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 This store is now closed. Thus, there is no employee with the title of "Operations Manager."

15 SPECIAL INTERROGATORY NO. 270

16 IDENTIFY YOUR current Operations Manager in YOUR Polo Jeans Co. Factory store in
17 Gilroy, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 270

19 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
20 term "Operations Manager." Defendants further object on the ground that this request seeks
21 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
22 evidence since it seeks information regarding a store no longer doing business.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 This store is now closed. Thus, there is no employee with the title of "Operations Manager."

25 SPECIAL INTERROGATORY NO. 271

26 IDENTIFY YOUR current Operations Manager in YOUR Polo Jeans Co. Factory store in San
27 Diego, California.

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 271

2 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
3 term "Operations Manager." Defendants further object on the ground that this request seeks
4 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
5 evidence since it seeks information regarding a store no longer doing business.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 This store is now closed. Thus, there is no employee with the title of "Operations Manager."

8 SPECIAL INTERROGATORY NO. 272

9 IDENTIFY the person or persons most knowledgeable regarding sales commission
10 reconciliations for SALES ASSOCIATES employed in your Ralph Lauren stores in California at the
11 present time.

12 RESPONSE TO SPECIAL INTERROGATORY NO. 272

13 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
14 term "Operations Manager." Defendants further object on the ground that this request seeks
15 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiving these objections, Defendants respond as follows:

18 Evan Cohen, Manager of Store Operations - Full Price Retail Stores

19 SPECIAL INTERROGATORY NO. 273

20 IDENTIFY the person or persons most knowledgeable regarding YOUR compliance with
21 California laws governing the accurate and timely payment of wages to YOUR SALES
22 ASSOCIATES.

23 RESPONSE TO SPECIAL INTERROGATORY NO. 273

24 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
25 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
26 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
27 evidence.

28 ///

1 Subject to and without waiving these objections, Defendants respond as follows:

2 Evan Cohen, Manager of Store Operations - Full Price Retail Stores- Full Price Retail Stores

3 Kim Babka - Regional Director

4 Kristi Mogel - Regional Human Resources Manager

5 Sharonda Weatherspoon - Director of Human Resources Manager - FSC Stores

6 SPECIAL INTERROGATORY NO. 274

7 State the number of YOUR SALES ASSOCIATES in California who have quit between
8 May 30, 2002 and the present.

9 RESPONSE TO SPECIAL INTERROGATORY NO. 274

10 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
11 burdensome, and vague and ambiguous as to the phrase "who have quit," as well as to time.
12 Defendants further object on the ground that this request seeks information that is not relevant and is
13 not reasonably calculated to lead to the discovery of admissible evidence.

14 Subject to and without waiving these objections, Defendants respond as follows:

15 See information contained in chart, attached hereto as Exhibit A.

16 SPECIAL INTERROGATORY NO. 275

17 State the number of YOUR SALES ASSOCIATES in California whose employment YOU
18 have terminated between May 30, 2002 and the present.

19 RESPONSE TO SPECIAL INTERROGATORY NO. 275

20 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
21 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
22 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Subject to and without waiving these objections, Defendants respond as follows:

25 See information contained in chart, attached hereto as Exhibit A.

26 SPECIAL INTERROGATORY NO. 276

27 IDENTIFY each business entity that, at any time from May 30, 2002 to the present, owned or
28 operated YOUR Burlingame Avenue store in Burlingame, California.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 276

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
4 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 Fashions Outlet of America, Inc., Western Polo Retailers, LLC

8 SPECIAL INTERROGATORY NO. 277

9 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
10 owned or operated YOUR South Coast Plaza store in Costa Mesa, California.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 277

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
14 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 Fashions Outlet of America, Polo California, LLC

18 SPECIAL INTERROGATORY NO. 278

19 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
20 owned or operated YOUR Girard Avenue store in La Jolla, California,

21 RESPONSE TO SPECIAL INTERROGATORY NO. 278

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
24 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 Fashions Outlet of America, Inc., Western Polo Retailers, LLC

28 ///

1 SPECIAL INTERROGATORY NO. 279

2 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
3 owned or operated YOUR Malibu Ralph Lauren store.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 279

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
7 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 Fashions Outlet of America, Polo California, LLC

11 SPECIAL INTERROGATORY NO. 280

12 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
13 owned or operated YOUR Ralph Lauren Stanford Shopping Center store in Palo Alto, California.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 280

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
17 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 Fashions Outlet of America, Inc., Western Polo Retailers, LLC

21 SPECIAL INTERROGATORY NO. 281

22 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
23 owned or operated YOUR Rugby store in Palo Alto, California.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 281

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
27 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 Fashions Outlet of America, Polo California, LLC

3 SPECIAL INTERROGATORY NO. 282

4 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
5 owned or operated YOUR Pavilions Lane store in Sacramento, California.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 282

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
9 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 The Sacramento store is licensed by Julius Clothing, LLC, a California corporation.

13 SPECIAL INTERROGATORY NO. 283

14 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
15 owned or operated YOUR Post Street Ralph Lauren store in San Francisco, California.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 283

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
19 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 Fashions Outlet of America, Inc., Polo California, LLC

23 SPECIAL INTERROGATORY NO. 284

24 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
25 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Alpine, California.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 284

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks

1 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 Fashions Outlet of America, Inc., Polo California, LLC

5 SPECIAL INTERROGATORY NO. 285

6 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
7 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Anderson, California.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 285

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
11 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 Fashions Outlet of America, Inc., Polo California, LLC

15 SPECIAL INTERROGATORY NO. 286

16 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
17 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Barstow, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 286

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
21 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 Fashions Outlet of America, Inc., Polo California, LLC

25 SPECIAL INTERROGATORY NO. 287

26 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
27 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Cabazon, California.

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1 RESPONSE TO SPECIAL INTERROGATORY NO. 287

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
4 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 Fashions Outlet of America, Inc., R.L. Fashions of Cabazon, CA

8 SPECIAL INTERROGATORY NO. 288

9 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
10 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Camarillo, California.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 288

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
14 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 Fashions Outlet of America, Inc., Polo California, LLC

18 SPECIAL INTERROGATORY NO. 289

19 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
20 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Carlsbad, California.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 289

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
24 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 Fashions Outlet of America, Inc., Polo California, LLC

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1 SPECIAL INTERROGATORY NO. 290

2 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
3 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Gilroy, California.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 290

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
7 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 Fashions Outlet of America, Inc., Polo California, LLC

11 SPECIAL INTERROGATORY NO. 291

12 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
13 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Mammoth Lakes, California.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 291

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
17 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 Fashions Outlet of America, Inc., Polo California, LLC

21 SPECIAL INTERROGATORY NO. 292

22 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
23 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in. Ontario, California.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 292

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
27 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 Fashions Outlet of America, Inc., Polo California, LLC

3 SPECIAL INTERROGATORY NO. 293

4 IDENTIFY the company or 'companies that, at any time from May 30, 2002 to the present,
5 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Pismo Beach, California.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 293

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
9 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 Fashions Outlet of America, Inc., Polo California, LLC

13 SPECIAL INTERROGATORY NO. 294

14 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
15 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in San Diego, California.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 294

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
19 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 Fashions Outlet of America, Inc., Polo California, LLC

23 SPECIAL INTERROGATORY NO. 295

24 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
25 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Tulare, California.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 295

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks

1 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 Fashions Outlet of America, Inc., Polo California, LLC

5 SPECIAL INTERROGATORY NO. 296

6 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
7 owned or operated YOUR Polo Ralph Lauren Factory Outlet store in Vacaville, California.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 296

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
11 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 Fashions Outlet of America, Inc., Polo California, LLC

15 SPECIAL INTERROGATORY NO. 297

16 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
17 owned or operated YOUR Polo Jeans Co. Factory store in Cabazon, California.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 297

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
21 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 Fashions Outlet of America, Inc., R.L. Fashions of Cabazon, CA, LLC

25 SPECIAL INTERROGATORY NO. 298

26 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
27 owned or operated YOUR Polo Jeans Co. Factory store in Camarillo, California.

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 298

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
4 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 Fashions Outlet of America, Inc., Polo California, LLC

8 SPECIAL INTERROGATORY NO. 299

9 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
10 owned or operated YOUR Polo Jeans Co. Factory store in Gilroy, California.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 299

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
14 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 Fashions Outlet of America, Inc., Polo California, LLC

18 SPECIAL INTERROGATORY NO. 300

19 IDENTIFY the company or companies that, at any time from May 30, 2002 to the present,
20 owned or operated YOUR Polo Jeans Co. Factory store in San Diego, California.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 300

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome, vague and ambiguous. Defendants further object on the ground that this request seeks
24 information that is not relevant and is not reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 Fashions Outlet of America, Inc., Polo California, LLC

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SPECIAL INTERROGATORY NO. 301

Describe in detail all litigation (by pertinent case name, number, and court) filed in the last 10 years against you that involves allegations that you failed to compensate a California employee or employees for hours worked off the clock.

RESPONSE TO SPECIAL INTERROGATORY NO. 301

Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the terms "describe" and "detail." Defendants further object to this request on the ground that this request seeks information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, Defendants respond as follows:
No litigation has been filed against Polo in the last 10 years that is responsive to this interrogatory.

SPECIAL INTERROGATORY NO. 302

Describe in detail all litigation (by pertinent case name, number, and court) filed in the last 10 years against you that involves allegations about your alleged failure to provide rest breaks to an employee or employees in California.

RESPONSE TO SPECIAL INTERROGATORY NO. 302

Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the terms "describe" and "detail." Defendants further object to this request on the grounds that it is vague, ambiguous, overbroad, and seeks information that is irrelevant to this dispute.

Subject to and without waiving these objections, Defendants respond as follows:

Lazon v. Club Monaco, Case No. CGC 06-229963, Superior Court for the State of California, County of San Francisco, filed March 2, 2006.

SPECIAL INTERROGATORY NO. 303

Describe in detail all litigation (by pertinent case name, number, and court) filed in the last 10 years against you that involves allegations challenging your loss prevention searches.

RESPONSE TO SPECIAL INTERROGATORY NO. 303

Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the terms "describe" and "detail." Defendants further object to this request on the ground that this

1 request seeks information that is not relevant and is not reasonably calculated to lead to the discovery
2 of admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 No litigation has been filed against Polo in the last 10 years that is responsive to this
5 interrogatory.

6 SPECIAL INTERROGATORY NO. 304

7 Describe in detail all litigation (by pertinent case name, number, and court) filed in the last
8 10 years against you that involves allegations challenging your ARREARS PROGRAM.

9 RESPONSE TO SPECIAL INTERROGATORY NO. 304

10 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
11 terms "describe" and "detail." Defendants further object to this request on the ground that this
12 request seeks information that is not relevant and is not reasonably calculated to lead to the discovery
13 of admissible evidence.

14 Subject to and without waiving these objections, Defendants respond as follows:

15 No litigation has been filed against Polo in the last 10 years that is responsive to this
16 interrogatory.

17 SPECIAL INTERROGATORY NO. 305

18 Describe in detail all class action litigation (by pertinent case name, number, and court) filed
19 in the last 10 years against you that involved class members who were your California employees.

20 RESPONSE TO SPECIAL INTERROGATORY NO. 305

21 Defendants object to this interrogatory on the grounds that it is vague and ambiguous as to the
22 terms "describe" and "detail." Defendants further object to this request on the ground that this
23 request seeks information that is not relevant and is not reasonably calculated to lead to the discovery
24 of admissible evidence.

25 Subject to and without waiving these objections, Defendants respond as follows:

26 Esteen v. Polo Ralph Lauren Corp., Case No. 418019, Superior Court for the State of
27 California, County of San Francisco, filed March 25, 2003
28

1 Young v. Polo Retail, LLC, Case No. C 02-4546, United States District Court, Northern
2 District of California, filed September 18, 2002.

3 Lazon v. Club Monaco, Case No. CGC 06-229963, Superior Court for the State of California,
4 County of San Francisco, filed March 2, 2006.

5 Brown v. Albertsons, Inc., Case No. BC 294155, Superior Court for the State of California,
6 County of Los Angeles, filed April 17, 2003.

7
8 Dated: 5-11-07

GREENBERG TRAURIG, LLP

9
10 By: 

11 William J. Goines
12 Brian S. Cousin
13 Neil A. Capobianco
14 Jeremy A. Meier
15 Alisha M. Louie

16 Attorney for Defendants Polo Ralph Lauren
17 Corporation; Polo Retail, LLC; Polo Ralph Lauren
18 Corporation, doing business in California as Polo
19 Retail Corporation; and Fashions Outlet of America,
20 Inc

1 **VERIFICATION**

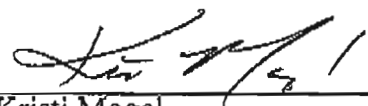
2 STATE OF CALIFORNIA)
3 COUNTY OF SANTA CLARA)

4 I have read the foregoing DEFENDANTS POLO RALPH LAUREN
5 CORPORATION'S, POLO RETAIL, LLC., POLO RALPH LAUREN CORP. DBA POLO
6 RETAIL CORP.'S AND FASHIONS OUTLET OF AMERICA, INC.'S RESPONSES TO
PLAINTIFFS' SPECIAL INTERROGATORIES (SET ONE) and know its contents.

7 I am the Regional Human Resources Manager for Polo Ralph Lauren Corp., a party
8 to this action, and am authorized to make this verification for and on behalf of Polo Ralph
9 Lauren Corp., Polo Retail, LLC., Polo Ralph Lauren Corp. dba Polo Retail Corp. and
10 Fashions Outlet of America, Inc., and I make this verification for that reason. The matters
11 stated in the foregoing document, pertaining to the full price retail stores, are true of my
own knowledge except as to those matters which are stated on information and belief, and
as to those matters I believe them to be true.

12 Executed on May 3, 2007, at Palo Alto, California.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 
16 Kristi Mogel

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VERIFICATION

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VERIFICATION

STATE OF NEW JERSEY)
COUNTY OF BERGEN)

I have read the foregoing DEFENDANTS POLO RALPH LAUREN CORPORATION'S, POLO RETAIL, LLC., POLO RALPH LAUREN CORP. DBA POLO RETAIL CORP.'S AND FASHIONS OUTLET OF AMERICA, INC.'S RESPONSES TO PLAINTIFFS' SPECIAL INTERROGATORIES (SET ONE) and know its contents.

I am the Human Resources Director - FSC stores, parties to this action, and am authorized to make this verification for and on behalf of Polo Ralph Lauren Corp., Polo Retail, LLC., Polo Ralph Lauren Corp. dba Polo Retail Corp. and Fashions Outlet of America, Inc., and I make this verification for that reason. The matters stated in the foregoing document, pertaining to Ralph Lauren Factory Store and Polo Jeans Co. are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on May 11, 2007, at Lyndhurst, New Jersey.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Sharonda L. Weatherspoon
Sharonda Weatherspoon

VERIFICATION